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February 13, 2020

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Evelina Calcano, et al. v. Vince Holding Corp.*
Case No. 1:19-cv-11445-JMF

Dear Judge Furman:

This firm represents defendant Vince Holding Corp. (“Vince”) in the above-captioned matter. In plaintiff Evelina Calcano’s (“Plaintiff”) Class Action Complaint, she asserts that Vince has discriminated against her, and other similarly situated individuals, by failing to sell store gift cards that contain writing in Braille. Vince intends to file a motion to dismiss the Complaint, and it has discussed this with Plaintiff’s counsel.

In an effort to work cooperatively, the parties have agreed upon a proposed briefing schedule, which we respectfully submit to Your Honor for approval. Vince’s response to the Complaint is currently due on March 2, 2020. Pursuant to the parties’ proposed briefing schedule, Vince will file its motion to dismiss by March 25, 2020. Accordingly, Vince also respectfully requests that the Court extend its time file its responsive pleading by 23 days.

The parties’ proposed briefing schedule is as follows: As stated above, Vince will file its motion to dismiss by March 25, 2020. Plaintiff will either oppose Vince’s motion or amend the Complaint by April 22, 2020. If Plaintiff opposes the motion, rather than amending the Complaint, Vince will file its reply by May 6, 2020. If Plaintiff files an Amended Complaint, Vince will file a motion to dismiss the Amended Complaint by May 21, 2020. Plaintiff will file her opposition by June 15, 2020. Vince will file its reply by June 30, 2020.

The parties also respectfully request that the Initial Conference, which is currently scheduled for March 25, 2020, be adjourned *sine die*, until after the Court has had the opportunity to issue a decision on Vince’s motion to dismiss.

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This is Vince's first request for an extension of time to respond to the Complaint, and Plaintiff's counsel consents to this request. Additionally, this is the parties' first request for an adjournment of the Initial Conference. The requested extension and the parties' proposed briefing schedule will not impact any other scheduled dates.

We thank the Court for its consideration of this request.

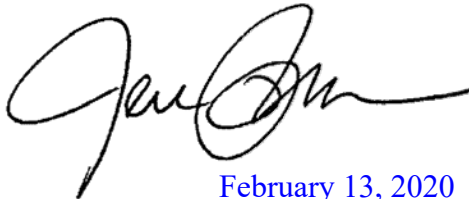
Respectfully Submitted,

/s/ Shira M. Blank

Shira M. Blank

cc: Darryn Solotoff (via ECF)

Application GRANTED. The parties' proposed briefing schedule is adopted. The conference scheduled for March 25, 2020 is adjourned *sine die*. The Clerk of Court is directed to terminate ECF No. 11. SO ORDERED.

A handwritten signature in black ink, appearing to read "Jesse M. Furman", is written over the date. The signature is fluid and cursive.

February 13, 2020